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10 Attorneys for Counterclaim-Plaintiff and Defendant  
MILK MOOVEMENT, INC. and  
11 Defendant MILK MOOVEMENT, LLC

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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

14 EVER.AG, LLC, a Delaware Limited Liability  
15 Company,  
16 Plaintiff,

17 v.

18 MILK MOOVEMENT, INC., a foreign  
Corporation, and MILK MOOVEMENT,  
19 LLC, a Delaware Limited Liability  
Company,

20 Defendants.

21 MILK MOOVEMENT, INC., a foreign  
Corporation,

22 Counterclaim-Plaintiff,

23 v.

24 EVER.AG, LLC, a Delaware Limited Liability  
Company,

25 Counterclaim-Defendant.

Case No.: 2:21-CV-02233-WBS-AC

**[PROPOSED] ORDER REGARDING  
MILK MOOVEMENT'S AND EVER.AG'S  
FACT WITNESS DEPOSITIONS AND  
PRIVILEGE LOGS**

1 Defendants Milk Moovement, Inc. and Milk Moovement LLC (together, "Milk  
2 Moovement") and Plaintiff Ever.Ag, LLC ("Ever.Ag" and, with Milk Moovement, the "Parties"),  
3 filed a Joint Stipulation to Continue Discovery Deadlines on September 28, 2023. After reviewing  
4 the submission of counsel, and for good cause shown, this Court hereby GRANTS the Joint  
5 Stipulation and ORDERS that:

- 6 1. The Parties may take depositions of fact witnesses beyond the October 27, 2023 fact  
7 discovery deadline, upon agreement of the parties; and  
8 2. The Parties shall exchange privilege logs by October 9, 2023, with any challenges to  
9 claims of privilege filed by October 18, 2023.

10 **IT IS SO ORDERED.**

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12 Dated: September 29, 2023

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14 ALLISON CLAIRE  
15 UNITED STATES MAGISTRATE JUDGE  
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